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November 18, 2016

VIA ECF
Honorable Sandra L. Townes
Unites States District Judge
Eastern District of New York
225 Cadman Plaza East,
Brooklyn, NY 10007

Re: Jamese Valme v. City of New York, et al., 14 CV 6991 (SLT)(MDG)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, Elbert Villavicencio, Peter McCarthy and Paul Marconi in the above-referenced matter. I write pursuant to Your Honor's Order dated November 4, 2016 directing the parties to agree upon and file a proposed schedule by November 18, 2016. While the undersigned has sent the proposed schedule to plaintiff's counsel, David Zelman, Esq., as of this writing plaintiff's counsel has not been able to advise as to his position regarding the proposed dates.

As such, defendants respectfully request that the Court adopt the following motion schedule:

January 20, 2017 – Defendants' Motion for Summary Judgment
February 10, 2017 – Plaintiff's Opposition to Defendants' Motion
February 24, 2017 – Defendants' Reply

I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/

Deborah L. Mbabazi
Assistant Corporation Counsel
Special Federal Litigation Division

cc: David A. Zelman, Esq. (Via ECF)
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